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6 UNITED STATES DISTRICT COURT  
7  
8 CENTRAL DISTRICT OF CALIFORNIA

9  
10 STEPHEN CHAPMAN,

11 Plaintiff,

12 vs.

13  
14 HORACE MANN PROPERTY &  
15 CASUALTY INSURANCE COMPANY,  
16 et al.,

17 Defendant

Case No.: 2:24-cv-10546-MWF-BFM

NOTICE OF MOTION AND MOTION FOR  
JUDICIAL NOTICE OF NOTICE OF  
MOTION TO REMAND SUA SPONTE

*Fiat Justitia, Ruat Caelum: Mala  
Fide Remotio Must Not Stand*

Dated: 03/03/2025

18  
19  
20 TO THE HONORABLE COURT AND COUSEL OF RECORD,

21 Plaintiff, STEPHEN CHAPMAN, appearing pro se,  
22 respectfully moves this Court to recognize its lack of  
23 subject matter jurisdiction and **remand this case to the**  
24 **Superior Court of California, County of Los Angeles where**  
25 **Matters on the Forum Defendant, Leave of Court, Striking the**  
26 **Defendant's Improper Assertion of Judicial Authority will all**  
27 **be Heard 03/13/2025.** This evidence in this motion confirms  
28

NOTICE OF MOTION AND MOTION FOR JUDICIAL NOTICE OF NOTICE OF  
MOTION TO REMAND SUA SPONTE

1 federal removal process fraudulently undertaken hath failed,  
2 as the state court took measures to protect its jurisdiction  
3 and Retained Jurisdiction and continues proceedings despite  
4 Defendant's attempted removal. **This motion seeks to have the**  
5 **federal court acknowledge that removal jurisdiction was never**  
6 **properly established.** Plaintiff acted diligently to inhibit  
7 the premature assertion of judicial authority that was  
8 **exerted by the defense through invalid papers** aimed to  
9 control and prescribe the timeline and cadence of this matter  
10 to this court.  
11

12  
13 **Plaintiff Stephen Chapman respectfully moves this Court**  
14 **for an order remanding this case to the Superior Court of**  
15 **California, County of Los Angeles, based on significant**  
16 **procedural defects, misrepresentation of jurisdictional**  
17 **facts, and Defendant's strategic misconduct to manufacture**  
18 **federal jurisdiction improperly.** Plaintiff further moves to  
19 strike Defendant's NOR, Opposition to Plaintiff's Ex Parte  
20 Application, Motion for Equitable tolling and remand, which  
21 contains material misrepresentations, untimely rebuttals,  
22 and false claims of procedural errors, designed to mislead  
23 the Court and prejudice the Plaintiff.  
24  
25 California's strict insurance regulations and consumer  
26 protection laws, which provide comprehensive remedies  
27 unavailable under federal law.  
28

**NOTICE OF MOTION AND MOTION FOR JUDICIAL NOTICE OF NOTICE OF  
MOTION TO REMAND SUA SPONTE**

1       **INTRODUCTION**

2       This case involves claims governed exclusively by limit  
3       Plaintiff's ability to obtain full relief, as California law  
4       provides additional statutory penalties, consumer protections  
5       , and regulatory oversight specifically tailored for cases  
6       like this one. The State Court has already exercised  
7       jurisdiction over this matter, scheduling a hearing on March  
8       13, 2025, to resolve jurisdictional issues and rule on  
9       Plaintiff's pending motions. The removal should be declared  
10      defective and remanded, as Defendant:

11      Failed to timely file notice of removal in State Court,  
12      violating 28 U.S.C. § 1446(d).

13      Fabricated diversity jurisdiction by misrepresenting  
14      corporate ownership.

15      Unilaterally filed a Rule 26(f) Report containing false  
16      claims, without Plaintiff's participation.

17      Engaged in procedural gamesmanship to prevent Plaintiff from  
18      timely objecting to removal.

19      Plaintiff also seeks sanctions against Defendant for its  
20      continued manipulation of jurisdictional facts,  
21      misrepresentations in filings, and perjury across all moving  
22      papers filed by the Defendant and they littler the record  
23      with misrepresentations and left unchecked, they dictate a  
24      

25      **NOTICE OF MOTION AND MOTION FOR JUDICIAL NOTICE OF NOTICE OF**  
26      **MOTION TO REMAND SUA SPONTE**

1 pivotal untruth in this matter aimed to rewrite history to  
2 benefit them if appealed.

3 **I. BACKGROUND**

4 The forum defendant rule exists to prevent local  
5 defendants from manipulating diversity jurisdiction to  
6 remove cases they should rightfully defend in state court.  
7 Allowing snap removal undermines this principle and  
8 encourages defendants to exploit procedural loopholes  
9 rather than litigate cases fairly in the proper forum. *See:*  
10 *Gentile v. Biogen Idec, Inc.*, 934 F. Supp. 2d 313 (D. Mass.  
11 2013) - *Snap removal contradicts Congressional intent*  
12 *behind the forum defendant rule* - and - *Vallejo v. Amgen,*  
13 *Inc.*, 2013 WL 12147584 (C.D. Cal. 2013) - *The forum*  
14 *defendant rule should not be circumvented by pre-service*  
15 *removal.*

16 **II. PROCEDURAL MANIPULATION AND DUE PROCESS VIOLATIONS**

17 Snap removal disproportionately benefits corporate  
18 defendants who closely monitor electronic dockets and file  
19 removal notices before plaintiffs have a meaningful chance  
20 to serve them. This tactic:

21 Strips plaintiffs of their right to choose a forum, even  
22 where Congress specifically intended to protect state  
23 jurisdiction. Creates an imbalance in procedural fairness,  
24 favoring sophisticated, well-resourced corp. defendants over  
25  
26  
27  
28

individual litigants. See: *Standing v. Watson Pharm., Inc.*, 2020 WL 12884556 (C.D. Cal. 2020) – Courts should reject removal tactics that undermine due process and fairness. *Goodwin v. Reynolds*, 757 F.3d 1216 (11th Cir. 2014) – Bad-faith procedural tactics in removal justify remand.

### III. FEDERALISM CONCERNS: PROTECTING STATE COURT

#### JURISDICTION

Snap removal undermines the authority of state courts by allowing defendants to remove cases before state courts have had an opportunity to act. **This practice erodes state sovereignty and allows defendants to override state jurisdiction through procedural manipulation.** See: *Gaus v. Miles, Inc.*, 980 F.2d 564 (9th Cir. 1992) – "Federal jurisdiction must be rejected if there is any doubt as to the right of removal."

#### **Plaintiff's Procedural Stopgap: Counterstrategy against Snap Removal**

Defendant engaged in a calculated removal strategy designed to manipulate the litigation timeline and obstruct Plaintiff's procedural rights.

Prematurely and without Judicial Authority the Defendant as Mailed and emailed Plaintiff unfiled, unauthorized legal documents purporting to be a removal notice.

1 The defendant claims to have filed the Notice of Removal  
2 (NOR) in Federal Court on 12/06/2024, only perfecting the  
3 docket **12/11/2024 [(ECF No. 1-1)]** - see [**(Exhibit 7)**  
4 **counsel confirms no record of filing, stamped copies**  
5 **required]** thereby

- 6  
7 • **(1)** deeming the NOR void of Judicial authority until  
8 December **11<sup>th</sup>, 2024 [(ECF No. 7)]** thereby making the  
9 removal improper as in excess of its 30-days from the date  
10 of service on the Defendant (11-08-2024)  
11 Concealed the NOR and failed service on the State Court.  
12 Second service must be done "**promptly**" as required under  
13 the revised **28 U.S.C. § 1446(d)**.  
14
- 15 • **(2)** and although if moving papers were served properly  
16 between December 6<sup>th</sup> and December 11<sup>th</sup> they might be  
17 considered as prompt - however, deficient, premature, and  
18 without judicial authority. -and **Lastly** -  
19
- 20 • **(3)** in considering all moving papers used to notify and  
21 serve the NOR to **all Courts and persons on or after the 11<sup>th</sup>**  
22 **are rendered fraudulent, null and void** - on the basis that  
23 they all swear under penalty of Perjury to have been served  
24 on the state and notified the plaintiff on December 6<sup>th</sup>,  
25 2024. However the State Court docket, and Plaintiff - have  
26 no such records.  
27  
28

1 Therefore - the removal was improper and could not  
2 attach. Thus, the state court continues to exercise its  
3 Jurisdictional rights as the Plaintiff in this matter had  
4 enough foresight to take proactive measures to create a  
5 **procedural stopgap in the removal. By having the court's**  
6 **acknowledgment having accepted SAC evidenced by the clerk**  
7 **confirmation, filed Declaration, and subsequent motions.**  
8 **But unable to grant leave of court in time, the plaintiff**  
9 **effectively filed a Declaration and Notice upon the Court**  
10 **that made solid arguments to identify the local agent and**  
11 **his role in this matter -** as an indispensable key defendant  
12 who's joinder could not be reasonably challenged as  
13 fraudulent - and further Motioning to the court that if  
14 granted leave Mr. Pruitt would be joined immediately so  
15 that full relief could be sought by the plaintiff - under  
16 the authority of the state from which the contract was  
17 established and the parties were bound to by residence and  
18 the terms as agreed upon **[(Exhibit 3-4) Ins. Policy**  
19 **Endorsement Pags]** Signatures include geo location -  
20 California - Director, President, and CEO of "Horace  
21 Mann," Agent and Former Broker, Raymond Pruitt; and the  
22 Insured, Plaintiff Stephen Chapman.

23 Despite this the Defendants attempted to leverage  
24 Plaintiff's pro se status to create procedural confusion  
25  
26  
27  
28

1 and a false forum to control his efforts away from the  
2 federal proceedings as they advance to effectively trigger  
3 the Court's expectation on the Rule 26 (f) report as a way  
4 to exhaust the resource limited litigant - without had been  
5 allowed to participate in discovery or proceedings to gain  
6 a tactical advantage obstruction of due process, a fair and  
7 speedy trial see [(ECF No.3-7), and (ECF No.9-24)] the  
8 Plaintiff recognizes the he received the judges self-  
9 representation order [(ECF No. 8) Dated 12/12/2024]  
10 previously and at the time mistaken for the official NOR as  
11 referred to in the Defendant's Declaration in support of  
12 ...Opposition [(ECF No. 25 1-1 pg 2) - the plaintiff's  
13 ability to participate was not only limited by the  
14 Plaintiff, but also by this Court, as reflected in the  
15 docket [(ECF No. 24) RtN to Sender] Plaintiff notes a  
16 clerical error made by the Sender \*see address "No 336"  
17 instead of "Apt. 336, or just 336, as stated in Pacer and  
18 the Court Docket.

19  
20  
21  
22 Despite the plaintiff being **deprived of participating**  
23 **in ADR**, and obstructing plaintiff proceeding before the  
24 **Magistrate judge** or having any time to become more educated  
25 on wither of this rightfully due processes the Defendant  
26 files a unilateral Rule 26 (f) report that they expressed  
27 no intention on formulating jointly as their first an  
28



1 initial contact in this regard was to explain the  
2 segregated predisposition format that this faux  
3 collaboration would take place [(Exhibit 5, 6, 7) General  
4 Email straight forward text] then hijacked the Plaintiffs  
5 input to shape this strategy and file the report  
6 unilaterally despite the plaintiff's timely participation  
7 in meeting the Defendant's proposed deadline of Jan 27,  
8 2025 at 2 PM. [(Exhibit 8) email sent 1:38 PM with attached  
9 Rule 26]. Notably, on Jan 27<sup>th</sup>, 2025 - the Plaintiff was at  
10 the Superior Court obtaining a Summons for Mr. Pruitt -  
11 unfortunately, the (Dept. 40) Clerk was absent that day -  
12 although the Plaintiff was issued a summons [(Exhibit 2,  
13 01/27/2025 Summons Issuance)]. The Court's continued  
14 demonstration of its Jurisdiction authority is clear and  
15 further demands to argue in a forum that is improper and  
16 without jurisdiction further disadvantages the Plaintiff  
17 every second; and infringes on of his constitutional  
18 rights.

19  
20  
21  
22 **A. Counter Snap (Procedural Stopgap)**

23 Early identification based on patterns and other  
24 relevant data collected from publicly available cases led  
25 the plaintiff anticipate the litigation strategy of the  
26 defense and predict their bad-faith tactics effectively.  
27 Once actionable (on the estimated 30<sup>th</sup> day), the Plaintiff  
28

1 filed a **Motion to strike the Improper Removal** following the  
2 well pled papers and sworn declaration and accepted second  
3 amended complaint in State Court challenging the legitimacy  
4 of removal before it was effectuated, highlighting its  
5 invalidity, and **creating a procedural stopgap** against  
6 Defendant's gamesmanship.  
7

8 Timely, the Plaintiff used a combination of education  
9 in human behavior and intuition to aimed to Motion the  
10 Court to take judicial notice of the untimely service of  
11 the NOR in the presence of the forum defendant, preventing  
12 Defendant from asserting fraudulent diversity over proper  
13 jurisdiction.  
14

15 **B. Defendant's Failure to Properly Serve the State Court**  
16 **Promptly Under 28 U.S.C. § 1446(d):**

17 Defendants can no longer mettle in confusion through  
18 the ambiguity of what constitutes timely as the January  
19 2024 revision casts "prompt service on the state court must  
20 be made after the filing of such notice of removal of a  
21 civil action, the defendant or defendants shall give  
22 written notice thereof to all adverse parties and shall  
23 file a copy of the notice with the clerk of such State  
24 court, which shall affect the removal."  
25  
26

27 Although the ninth district is split when it comes to  
28 snap removal; however, as in *Greenway Nutrients, Inc. v.*

1       Pierce, The Ninth Circuit upholds the principle that even  
2       if non-diverse defendants haven't been served, their  
3       citizenship must still be considered when determining  
4       diversity jurisdiction. This case emphasizes that the  
5       presence of non-diverse parties, regardless of service  
6       status, can deprive the court of subject matter  
7       jurisdiction.  
8

9       Additionally, CCP Rule 3.3650 insulates this step to  
10      ensure given proper notice among all is met. Defendant  
11      failed to comply with these requirements, which is  
12      disrespectful, and the Court should seek sanctions on that  
13      alone. However, I digress - Instead, the Defendant delayed  
14      serving the State Court **until more than 31 days after**  
15      **removal**, to move between courts and advance proceedings  
16      undetected - violating the procedural rules governing  
17      removal  
18  
19

20      **Overreach by the Defendants requires Remand and**  
21      **Referral for Conduct Review** - The Defendant continually  
22      threatens and attempts to deny the State Court what is  
23      rightfully theirs to protect and thus it did by placing the  
24      matter under a protective special stay so the NOR could not  
25      attach or divest jurisdiction from the State - [Exhibit 6  
26      page one line state court reviews the NOR and will hear  
27      these arguments March 13, 2025, which the Court may allow  
28

1 leave to officiate proper joinder of Raymond Pruitt,  
2 subsequently striking the removal pursuant to **28 U.S.C.**  
3 **1441(b)(2)** and thus remanding the case and restoring full  
4 jurisdiction to its rightful venue where the action takes  
5 place.  
6

7 **The Plaintiff respectfully argues that equitable**  
8 **tolling and ex parte were warranted** as it is evident from  
9 the state and federal dockets and failure to serve the  
10 plaintiff on federal proceedings as it advanced and forced  
11 the courts hand through **unilaterally manipulation of the**  
12 **magistrate judge and rule 26 report hoping to leverage an**  
13 **unfair advantage.**  
14

15 **The defendant's actions demonstrate a deliberate**  
16 **attempt to mislead the plaintiff and the court. While the**  
17 **plaintiff was misled by the Defendant into addressing**  
18 **matters in the state, [(ECF No. 3, 4, 5, 6) Not served on**  
19 **the Plaintiff], and concealed by the defendant as they**  
20 **unilaterally proceeded to disadvantage the plaintiff and**  
21 **control the clock, including the premature initiation of**  
22 **the Rule 26(f) report. This tactic not only undermines the**  
23 **plaintiff's ability to participate effectively but also**  
24 **imposes undue pressure by creating a false sense of**  
25 **urgency. The defendant's calculated maneuvers are designed**  
26  
27  
28

1 to exploit procedural loopholes, thereby obstructing the  
2 plaintiff's right to a fair trial and due process.

3 This is not mere procedural defects, or a challenging  
4 environment, this is judicial gas lighting, this is fraud  
5 on the court, abuse of power, and the willful obstruction  
6 of due process -an infringement on the Plaintiff's  
7 constitutional rights to a fair and speedy trial.  
8

9  
10 This is not only grounds for remand - its grounds for  
11 judicial conduct and bar review.

12  
13 If the court disagrees, the Plaintiff respectfully  
14 asks the court to reconsider or dismiss this case without  
15 prejudice **citing reasons under FRCP Rule 19, and 20;** as  
16 undue prejudice imposed by the **defendants actions** deprive  
17 the Plaintiff from seeking full relief as being forced into  
18 parallel litigation and comply with federal orders and  
19 proceedings that have neglected his rights to participate  
20 and **ignore the key defendant responsible for initiating all**  
21 **causes of action in this matter from which where the breach**  
22 **of contract has been drawn under the state laws and state**  
23 **provisions from which both parties have agreed to be bound**  
24 **to [(see Exhibit 3-4) Ins. Policy, Endorsed by: Marita**  
25 **Zuraitias Director, President, and CEO at Horace Mann**  
26 **Insurance; Raymond Pruitt, Ca. Resident and Ca. Licensed**  
27  
28

1 Insurance Agent (prior to 2022 Pruitt was also a licensed  
2 insurance Broker) an appointee of "Horance Mann", (Horance  
3 Mann Policies issued under the Defunct entity, "Educators  
4 Insurance Sales LLC") and the signature, Plaintiff Stephen  
5 Chapman, policy holder - signature of Pruitt and Chapman  
6 stamped identifying the geo locations of both parties in  
7 California at the time policy contract was executed.  
8

9  
10 **THE MANUFACTURING OF JURISDICTION**

11 - The Defendant failed to disclose Company ownership  
12 as required under **FRCP Rule 7-7.1 [Exhibit 1 (ECF No. 2)**  
13 **Notice of Interested Parties]** - additionally Failed to  
14 include this an all-other moving papers filed in  
15 conjunction with the NOR, on the state court action.  
16

17 - Defendant falsified Company ownership in their  
18 unilateral Rule 26(f) Report as being "wholly owned...no  
19 entity owns 10% or more of its stock." [**Exhibit 1 (ECF No.**  
20 **16) Def's Rule 26 Report]**. Publicly sourced SEC filings and  
21 public reports confirm [(see Exhibit 5)SEC and Published  
22 Reports)]:  
23

24 **1. BlackRock owns ~15% of "Horace Mann."**

25 With influential business ties through the lease of  
26 software from BlackRock Inc. to Horace Mann, necessary  
27 to Horace Manns' business.  
28

1           2. **Vanguard owns ~13%** of "Horace Mann."

2           **These are no insignificant findings** Because Defendant  
3 misrepresented corporate ownership in both its removal  
4 notice and their Rule 26(f) Report, it **cannot establish**  
5 **complete diversity under 28 U.S.C. § 1332 - therefore**  
6 **sanctions apply**

7  
8           - **immediate remand is mandatory under the laws held up**  
9 **by this Court.**

10           **III. ONGOING STATE COURT PROCEEDINGS SUPPORT REMAND**

11           Contrary to **Declarant's claims intended to**  
12 **mischaracterize and prejudice the plaintiff [Exhibit 1 ECF**  
13 **25-1, page 2]** in bad faith counsel states under penalty of  
14 perjury as she can and will testify under oath that "no  
15 proceedings have taken place in State Court since January  
16 7, 2025,"

17  
18           Plaintiff's **[(Exhibit 2) the State Court docket]**  
19 stands to contend with these admissions under oath. The  
20 Plaintiff asks the court to **strike this declaration**  
21 **[Exhibit 1 (ECF No. 25-1)]** from record as it was intended to  
22 cause further harm and support their facade; but also, the  
23 **Plaintiff respectfully asks that the court preserve this on**  
24 **the record and make judicial note of it within its context**  
25 **which was aimed to discredit and prejudice the Plaintiff,**  
26 **and as it is - a direct blemish on the Defendant's**

credibility to use as evidence demonstrating the defendant's character, lack of credibility, and malicious intent - as it may be come relevant at trial and at the Motion Hearing scheduled on March 13, 2025.

LASC REGISTERED ACTIONS AT THE STANLEY MOSK COURTHOUSE:  
[(Exhibit 2)], actions arising dated on and after 01/07/2025 in *descending order*

*\*\*Court on its own decision added the forum defendant, Raymond Pruitt to the record - see Exhibit 2*

- 02/18/2025 Notice OF **IMPROPER REMOVAL AND REQUEST FOR JUDICIAL ACTION**; Filed by: Stephen Chapman (Plaintiff); As to: Horace Mann Property & Casualty Insurance Company (Defendant); Raymond Pruitt (Defendant)
- 01/27/2025 Summons on Complaint (1st); **Issued and Filed by: Stephen Chapman (Plaintiff)**; As to: Horace Mann Property & Casualty Insurance Company (Defendant); **Raymond Pruitt** (Defendant)
- 01/21/2025 Civil Case Cover Sheet; Filed by: Stephen Chapman (Plaintiff)
- 01/14/2025 **Case Management Conference scheduled for 03/13/2025 at 08:30 AM** in Stanley Mosk Courthouse at Department 40

NOTICE OF MOTION AND MOTION FOR JUDICIAL NOTICE OF NOTICE OF MOTION TO REMAND SUA SPONTE



- 1 • **01/14/2025** Minute Order (Non-Appearence Case Review  
2 regarding Order to Show Cause Hear...)
- 3 • **01/14/2025 Certificate of Mailing for (Non-Appearence Case**  
4 **Review regarding Order to Show Cause Hear...) of**  
5 **01/14/2025; Filed by: Clerk**
- 6 • **01/14/2025** On the **Court's own motion, Order to Show Cause**  
7 **Re: Failure to File Proof of Service scheduled for**  
8 **02/26/2025 at 08:30 AM** in Stanley Mosk Courthouse at  
9 Department 40 Not Held - Vacated by Court on 01/14/2025
- 10 • **01/14/2025** On the Court's own motion, Case Management  
11 Conference scheduled for 02/26/2025 at 08:30 AM in Stanley  
12 Mosk Courthouse at Department 40 Not Held - Advanced and  
13 Continued - by Court was **rescheduled to 03/13/2025 08:30 AM**
- 14 • **01/07/2025** Notice of Removal to Federal Court; Filed by:  
15 Horace Mann Property & Casualty Insurance Company  
16 (Defendant)
- 17 • **01/07/2025** The case is placed in **special status** of: Stay -  
18 Removal to Federal Court
- 19 • **01/14/2025** Minute Order (Non-Appearence Case Review  
20 regarding Order to Show Cause Hear...)) noting that **the**  
21 **court reviews the Defendant's Notice of Removal and**  
22 **arguments will be heard on the\is matter as scheduled**  
23 **03/13/2025.**

1 Defendant's insistent & blatant misrepresentations to this  
2 Court regarding the status of the State Court case further  
3 justifies remand.

4 **IV. RELIEF SOUGHT**

5  
6  
7 1. This Court should strike Defendant's Notice of Removal  
8 and remand the case to state court with prejudice.

9 2. Court should consider Judicial review of Defendant's  
10 legal counsel is warranted under Gonzalez v. Thaler.

11 3. I respectfully request that this Court grant my Motion  
12 to Strike and Remand under 28 U.S.C. § 1447(c).

13 4. Strike all papers and pleadings of the Defendant's  
14 from 12/06/2024 onward as reasonably applicable

15 5. I request the Court impose sanctions against Defendant  
16 for procedural misconduct.

17 6. I urge the Court to refer Defendant's attorneys for  
18 judicial review due to potential misconduct.

19 7. I request the Court to admonish Defendant's brazen  
20 disregard and improper use of the removal process.

21  
22  
23  
24 **V. CONCLUSION**

25  
26 For the foregoing reasons, Plaintiff respectfully  
27 requests that this Court recognize its lack of jurisdiction  
28 and remand this matter to Los Angeles County Superior Court,

**NOTICE OF MOTION AND MOTION FOR JUDICIAL NOTICE OF NOTICE OF  
MOTION TO REMAND SUA SPONTE**

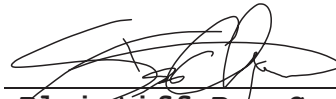
1 as required under **28 U.S.C. § 1447(c)**. The Ninth Circuit has  
2 consistently held that remand is mandatory when federal  
3 jurisdiction is lacking due to non-diverse parties. See *Gaus*  
4 *v. Miles, Inc.*, 980 F.2d 564 (**9th Cir. 1992**).

5  
6 Plaintiff **acknowledges the Court's recommendation to**  
7 **seek assistance from the pro se clinic** and has considered all  
8 **available legal resources**. However, *the clinic itself has*  
9 *conceded that it lacks the capacity to assist in complex*  
10 *insurance litigation matters such as this*. Furthermore, while  
11 **Plaintiff would have sought counsel if feasible**, insurance  
12 litigation of this nature presents significant economic  
13 barriers and practice complexity for attorneys, making it  
14 difficult to secure representation—even when claims are  
15 meritorious.  
16  
17

18  
19 Plaintiff **does not appear before this Court out of**  
20 **arrogance or misplaced confidence but out of necessity, as**  
21 **the systemic challenges in insurance disputes make legal**  
22 **representation unattainable in many cases**. The Defendant,  
23 well aware of this reality, has leveraged procedural  
24 maneuvering to complicate jurisdictional issues in an attempt  
25 to discourage litigation. Such tactics should not override  
26 the clear statutory mandate requiring remand.  
27  
28

1           Accordingly, Plaintiff urges this Court to uphold the  
2           law and immediately return this case to state jurisdiction.  
3

4  
5  
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8           Dated: March 03, 2025.

9           

10           \_\_\_\_\_  
11           Plaintiff Pro Se, Stephen  
12           Chapman  
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